

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION

MARQUIS L. CARTER,)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO: 4:24-CV-274
)	
MAERSK LINE, LIMITED-USA, d/b/a)	
MAERSK LINE, LIMITED, and)	
MAERSK SELETAR TRUST,)	
)	
Defendants.)	

JOINT CONSENT MOTION FOR SUBSTITUTION OF PARTIES

NOW COME the Plaintiff, Marquis L. Carter (“Plaintiff”) and Defendants Maersk Line, Limited-USA d/b/a Maersk Line, Limited and Maersk Seletar Trust (“Defendants”), and jointly move this Court pursuant to the Federal Rules of Civil Procedure, and, in particular, Fed. R. Civ. P. 1, 15, 17, 19, and 21 for an Order substituting Maersk Line, Limited, as a Party-Defendant in place of the currently named Defendants Maersk Line, Limited-USA d/b/a Maersk Line Limited and Maersk Seletar Trust, in order to reflect the correct entity that was the owner pro hac vice of the subject vessel at the time of the incident that gives rise to the Complaint in the above-styled action, in support of which the undersigned show the Court the following:

1. This case involves injuries allegedly sustained by Marquis Carter while working as a longshoreman aboard the vessel M/V MAERSK SELETAR.
2. The Plaintiff’s complaint sets forth allegations of negligence and liability on the part of the owner and or operator of the M/V MAERSK SELETAR.
3. At the time of the incident at issue, the vessel was under a bareboat charter agreement with Maersk Line Limited, making it the owner pro hac vice of the vessel.

4. Plaintiff and Defendants have now agreed to substitute Maersk Line, Limited, as a party-defendant in place of the currently named Defendants Maersk Line, Limited-USA d/b/a Maersk Line Limited and Maersk Seletar Trust. As part of that agreement to add Maersk Line, Limited, as a party-defendant, Plaintiff has agreed to dismiss the currently-named Defendants Maersk Line, Limited-USA d/b/a Maersk Line Limited and Maersk Seletar Trust without prejudice.
5. The undersigned counsel for the Defendants also serves as counsel for Maersk Line, Limited, and has agreed to accept service of process on behalf of Maersk Line, Limited, so as not to require any additional effort or expense on the part of Plaintiff to perfect service of process.

WHEREFORE, the Plaintiff Marquis Carter and Defendants Maersk Line, Limited-USA d/b/a Maersk Line Limited and Maersk Seletar Trust, based upon good cause and not for any improper purpose, hereby jointly move this Court pursuant to Federal Rules of Civil Procedure 15, 17, 19, and 21 for an Order adding Maersk Line, Limited, as a Party-Defendant in the above-reference matter and dismissing Defendants Maersk Line, Limited-USA d/b/a Maersk Line Limited and Maersk Seletar Trust without prejudice.

This 6th day of February, 2025.

SAVAGE TURNER PINCKNEY
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing upon all parties to this matter by using the CM/ECF system which will send a notice of electronic filing to the following:

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This 6th day of February, 2025.

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